

**THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2017-292WS

IN RE: Application of Carolina Water, Inc.)

for Adjustment of Rates and)
Charges and Modifications to Certain)
Terms and Conditions for the Provision)
of Water and Sewer Service)

**REBUTTAL TESTIMONY
OF
BOB GILROY**

Q. THE ORS RECOMMENDS THAT CWS' REQUEST TO REQUIRE RESIDENTIAL CUSTOMERS TO TEST BACK FLOW DEVICES EVERY TWO YEARS BE LIMITED ONLY TO CUSTOMERS WITH IRRIGATION CROSS CONNECTIONS. HOW DO YOU RESPOND? (SHELLINGER PAGE 11, LINE 1).

A. CWS agrees to limiting the testing requirement to every two years for those residential customers with irrigation cross connections unless the sewer system utilizes chemical injection for which annual testing will be required.

Q. PLEASE ADDRESS THE CONCERNS RAISED BY FORTY LOVE POINT CUSTOMERS BARBARA "BOBBIE" KING AND JAY DIXON IN THEIR PREFILED TESTIMONY.

A. The Forty Love sewer system is a LETTS design installed by the developer. LETTS systems are essentially modified septic tanks in which solid waste accumulates in a holding tank with the gray water draining to a common sewer main for transport to the Richland County Utilities treatment plant.

CWS has been working with the Kings and Dixons to determine why their LETTS tanks fail to drain during prolonged rain events. CWS believes the elevation and distance between their finished basements and the sewer main outside provides for no leeway when the sewer main backs up slightly. We currently have a contractor working to install a pump tank that will both pump their

1 water into the main and provide the separation needed to eliminate backups of their homes.

2 CWS is also retaining a professional engineering firm to inspect the system and help us solve
3 the sewerage backup problems experienced by these customers. We will continue to
4 communicate with the Forty Love Point Homeowners Association ("HOA") as we move through
5 the engineering assessment with the outside contractor. CWS and the HOA have agreed to report
6 their findings to the Commission and ORS in six months – by September 30, 2018.

7 While it is working towards a permanent solution, CWS will continue to alleviate the
8 problem by dispatching pump trucks to the neighborhood when heavy rains are anticipated. CWS
9 is also inspecting each LETTS tank and will reseal them as necessary. Reduced water from the
10 tanks should ease the stress placed on our system.

11 **Q. PLEASE RESPOND TO THE ORS PROPOSAL TO ADJUST OPERATION AND**
12 **MAINTENANCE EXPENSE FOR SLUDGE HAULING AT THE FRIARSGATE**
13 **WASTEWATER TREATMENT FACILITY (WWTF). (PAYNE PAGE 8, LINE 10-**
14 **ADJUSTMENT 9D).**

15 **A.** ORS has proposed to remove \$96,892 in sludge hauling costs associated with the operation
16 of the Friarsgate WWTF. Rather than allow CWS recovery of its known and measurable sludge
17 hauling costs, ORS proposes an adjustment to allow CWS recovery of only a three-year average
18 of annual sludge hauling costs at the Friarsgate WWTF. The Company opposes ORS' proposed
19 adjustment because the sludge hauling expenses are known and measurable and were prudently
20 incurred. In addition, ORS' adjustment is contrary to Commission precedent.

21 The Friarsgate WWTF produces large amounts of sludge that must be disposed of in a timely
22 manner. The amount of sludge produced is dependent on many factors within the process of the
23 waste water treatment. The active sludge inventory within the process must be kept at a certain
24 concentration in order for the biological process to be effective and result in a clear compliant

1 effluent. Excess sludge inventory must be removed on a frequent basis in order to keep sludge
2 from building up to unacceptable levels which could cause problems with effluent quality.

3 Because the Friarsgate WWTF has been on a Consent Order, these inventories are also
4 monitored by DHEC, which recommends that the inventory to be kept at a constant rate.
5 Ordinarily, the liquid sludge is poured into filtrate boxes that drain off the water leaving a very dry
6 cake behind which is then carried by Waste Management Services (fka Republic Waste Services)
7 and disposed of at the Northeast Sanitary Landfill. When the sludge production exceeds the
8 capacity of the filtrate boxes, CWS utilizes contractor liquid tanker trucks to transport the sludge
9 to the City of Cayce's disposal site. Disposing of the sludge in the cake form is more cost-effective
10 than hauling truckloads of liquid sludge. Although more expensive, there are times that the filtrate
11 boxes are full and tankers must be utilized. Because the sludge hauling costs are known and
12 measurable and were prudently incurred, CWS is entitled to the full recovery of these costs.

13 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

14 **A.** Yes, it does.